

# **EXHIBIT 4**

**Andrea P Roberts**

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**From:** Andrea P Roberts  
**Sent:** Thursday, June 08, 2017 5:21 PM  
**To:** Edward Takashima; Chang, Esther Kim; UberWaymoMoFoAttorneys; BSF\_EXTERNAL\_UberWaymoLit; nchatterjee@goodwinlaw.com; bschuman@goodwinlaw.com; sbrun@goodwinlaw.com; rwalsh@goodwinlaw.com  
**Cc:** QE-Waymo; John Cooper; Matthew Cate (MCate@fbm.com)  
**Subject:** RE: Waymo v. Uber Proposed ESI Order  
**Attachments:** Compare Result Re Jt Stip PO and Waymo Revisions.pdf; 9357964\_1\_Waymo Revisions to Uber Proposed PO (2017-06-08).docx

Counsel,

Attached are Waymo's revisions to Uber's proposed Protective Order. The Word document is a clean version and the PDF reflects the changes we made to Uber's proposal. Please let us know if Defendants agree to this proposal.

Additionally, please let us know when we can expect any comments from Defendants on the proposed ESI Order.

Thanks,  
Andrea

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**From:** Andrea P Roberts  
**Sent:** Wednesday, June 07, 2017 11:26 AM  
**To:** Edward Takashima <etakashima@BSFLLP.com>; Chang, Esther Kim <echang@mofo.com>; UberWaymoMoFoAttorneys <UberWaymoMoFoAttorneys@mofo.com>; BSF\_EXTERNAL\_UberWaymoLit <BSF\_EXTERNAL\_UberWaymoLit@BSFLLP.com>; nchatterjee@goodwinlaw.com; bschuman@goodwinlaw.com; sbrun@goodwinlaw.com; rwalsh@goodwinlaw.com  
**Cc:** QE-Waymo <qewaymo@quinnemanuel.com>; John Cooper <JCooper@fbm.com>  
**Subject:** RE: Waymo v. Uber Proposed ESI Order

Counsel,

We're working through the proposed Protective Order that Uber provided last Friday evening. Do Defendants have comments on the proposed ESI Order that we circulated on May 30?

Thanks,  
Andrea

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**From:** Edward Takashima [<mailto:etakashima@BSFLLP.com>]  
**Sent:** Friday, June 02, 2017 6:56 PM  
**To:** Andrea P Roberts <[andreaproberts@quinnemanuel.com](mailto:andreaproberts@quinnemanuel.com)>; Chang, Esther Kim <[echang@mofo.com](mailto:echang@mofo.com)>; UberWaymoMoFoAttorneys <[UberWaymoMoFoAttorneys@mofo.com](mailto:UberWaymoMoFoAttorneys@mofo.com)>; BSF\_EXTERNAL\_UberWaymoLit <[BSF\\_EXTERNAL\\_UberWaymoLit@BSFLLP.com](mailto:BSF_EXTERNAL_UberWaymoLit@BSFLLP.com)>; [nchatterjee@goodwinlaw.com](mailto:nchatterjee@goodwinlaw.com); [bschuman@goodwinlaw.com](mailto:bschuman@goodwinlaw.com); [sbrun@goodwinlaw.com](mailto:sbrun@goodwinlaw.com); [rwalsh@goodwinlaw.com](mailto:rwalsh@goodwinlaw.com)  
**Cc:** QE-Waymo <[qewaymo@quinnemanuel.com](mailto:qewaymo@quinnemanuel.com)>; John Cooper <[JCooper@fbm.com](mailto:JCooper@fbm.com)>  
**Subject:** RE: Waymo v. Uber Proposed ESI Order

Andrea,

We believe that the protective order should be based on the Northern District Model Protective Order for Litigation Involving Patents, Highly Sensitive Confidential Information and/or Trade Secrets, consistent with Magistrate Judge Corley's Civil Standing Order. We have taken the model order and made some initial redlines with changes that we think would be appropriate for this case. We will likely have additional redlines to the model as we confer internally and with counsel for Otto Trucking, but if Waymo can redline its proposals on this draft, that will significantly move things forward.

We are considering Waymo's proposed ESI Order. We will follow up with you on that early next week.

Thanks,

Ed

**Edward H. Takashima**

Partner

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**From:** Andrea P Roberts [<mailto:andraproberts@quinnemanuel.com>]

**Sent:** Friday, June 02, 2017 10:16 AM

**To:** Chang, Esther Kim; UberWaymoMoFoAttorneys; BSF\_EXTERNAL\_UberWaymoLit; [nchatterjee@goodwinlaw.com](mailto:nchatterjee@goodwinlaw.com); [bschuman@goodwinlaw.com](mailto:bschuman@goodwinlaw.com); [sbrun@goodwinlaw.com](mailto:sbrun@goodwinlaw.com); [rwalsh@goodwinlaw.com](mailto:rwalsh@goodwinlaw.com)

**Cc:** QE-Waymo; John Cooper

**Subject:** RE: Waymo v. Uber Proposed ESI Order

Esther,

I'm following up to see if Defendants have comments on the proposed Protective Order and ESI Order that we circulated.

Thanks,

Andrea

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**From:** Andrea P Roberts

**Sent:** Wednesday, May 31, 2017 5:26 PM

**To:** Chang, Esther Kim <[echang@mofo.com](mailto:echang@mofo.com)>; UberWaymoMoFoAttorneys <[UberWaymoMoFoAttorneys@mofo.com](mailto:UberWaymoMoFoAttorneys@mofo.com)>; 'BSF\_EXTERNAL\_UberWaymoLit@bsfllp.com' (<[BSF\\_EXTERNAL\\_UberWaymoLit@bsfllp.com](mailto:BSF_EXTERNAL_UberWaymoLit@bsfllp.com)>); [nchatterjee@goodwinlaw.com](mailto:nchatterjee@goodwinlaw.com); [bschuman@goodwinlaw.com](mailto:bschuman@goodwinlaw.com); [sbrun@goodwinlaw.com](mailto:sbrun@goodwinlaw.com); [rwalsh@goodwinlaw.com](mailto:rwalsh@goodwinlaw.com)

**Cc:** QE-Waymo <[qewaymo@quinnemanuel.com](mailto:qewaymo@quinnemanuel.com)>; John Cooper <[JCooper@fbm.com](mailto:JCooper@fbm.com)>

**Subject:** RE: Waymo v. Uber Proposed ESI Order

Esther,

Both the proposed Protective Order and proposed ESI Order are based upon Protective Orders and ESI Orders that Google has used in various litigations and jurisdictions.

We look forward to Defendants' comments on both.

Thanks,  
Andrea

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**From:** Chang, Esther Kim [<mailto:echang@mofo.com>]  
**Sent:** Wednesday, May 31, 2017 12:32 AM  
**To:** Andrea P Roberts <[andreaproberts@quinnemanuel.com](mailto:andreaproberts@quinnemanuel.com)>; UberWaymoMoFoAttorneys <[UberWaymoMoFoAttorneys@mofo.com](mailto:UberWaymoMoFoAttorneys@mofo.com)>; 'BSF\_EXTERNAL\_UberWaymoLit@bsflp.com' (<[BSF\\_EXTERNAL\\_UberWaymoLit@bsflp.com](mailto:BSF_EXTERNAL_UberWaymoLit@bsflp.com)>); [nchatterjee@goodwinlaw.com](mailto:nchatterjee@goodwinlaw.com); [bschuman@goodwinlaw.com](mailto:bschuman@goodwinlaw.com); [sbrun@goodwinlaw.com](mailto:sbrun@goodwinlaw.com); [rwalsh@goodwinlaw.com](mailto:rwalsh@goodwinlaw.com)  
**Cc:** QE-Waymo <[gewaymo@quinnemanuel.com](mailto:gewaymo@quinnemanuel.com)>; John Cooper <[JCooper@fbm.com](mailto:JCooper@fbm.com)>  
**Subject:** RE: Waymo v. Uber Proposed ESI Order

Andrea,

Is this based on a model order regarding ESI? If so, would you please identify the model order regarding ESI and send a redline?

Esther  
Tel: (415) 268-7562

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**From:** Andrea P Roberts [<mailto:andreaproberts@quinnemanuel.com>]  
**Sent:** Tuesday, May 30, 2017 4:13 PM  
**To:** UberWaymoMoFoAttorneys; 'BSF\_EXTERNAL\_UberWaymoLit@bsflp.com' (<[BSF\\_EXTERNAL\\_UberWaymoLit@bsflp.com](mailto:BSF_EXTERNAL_UberWaymoLit@bsflp.com)>); [nchatterjee@goodwinlaw.com](mailto:nchatterjee@goodwinlaw.com); [bschuman@goodwinlaw.com](mailto:bschuman@goodwinlaw.com); [sbrun@goodwinlaw.com](mailto:sbrun@goodwinlaw.com); [rwalsh@goodwinlaw.com](mailto:rwalsh@goodwinlaw.com)  
**Cc:** QE-Waymo; John Cooper  
**Subject:** Waymo v. Uber Proposed ESI Order

- External Email -

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Counsel,

Attached is a proposed ESI Order. This proposed Order is intended to govern discovery of ESI that is outside the scope of that ordered in Paragraph 6 of the May 11, 2017 Preliminary Injunction Order, i.e. "normal discovery." Please let us know if Defendants agree.

Thanks,  
Andrea

**Andrea Pallios Roberts**  
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